

## CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza  
New York, NY 10006-1470  
T: +1 212 225 2000  
F: +1 212 225 3999

clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW  
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG  
BEIJING • BUENOSAIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212 225 2840  
lfriedman@cgsgh.com

VICTOR I. LEWKOW  
LESLIE N. SILVERMAN  
LEE C. BUCHHEIT  
JAMES M. PEASLEE  
THOMAS J. MOLONEY  
DAVID G. SABEL  
JONATHAN I. BLACKMAN  
MICHAEL L. RYAN  
ROBERT P. DAVIS  
YARON Z. REICH  
RICHARD S. LINER  
STEVEN S. HOROWITZ  
JAMES A. DUNCAN  
STEVEN M. LOEB  
CRAIG B. BROD  
EDWARD J. ROSEN  
LAWRENCE B. FRIEDMAN  
NICOLAS GRABAR  
CHRISTOPHER E. AUSTIN  
SETH GROSSHANDLER  
HOWARD S. ZELBO  
DAVID E. BRODSKY  
ARTHUR H. KOHN  
RICHARD J. COOPER  
JEFFREY S. LEWIS  
PAUL J. SHIM  
STEVEN L. WILNER  
ERIKA W. NIJENHUIS  
ANDRES DE LA CRUZ  
DAVID C. LOPEZ  
JAMES L. BROMLEY  
MICHAEL A. GERSTENZANG  
LEWIS J. LIMAN  
LEV L. DASSIN  
NEIL G. WHORISKEY  
JORGE U. JUANTORENA  
MICHAEL D. WEINBERGER  
DAVID LEINWAND  
DIANA L. WOLLMAN  
JEFFREY A. ROSENTHAL

ETHAN A. KLINGSBERG  
MICHAEL D. DAYAN  
CARMINE D. BOCCUZZI, JR.  
JEFFREY D. KARPP  
KIMBERLY BROWN BLACKLOW  
ROBERT J. RAYMOND  
SUNG K. KANG  
LEONARD C. JACOBY  
SANDRA L. FLOW  
FRANCISCO L. CESTERO  
FRANCESCA L. ODELL  
WILLIAM L. MCRAE  
JASON FACTOR  
MARGARET S. PEONIS  
LISA M. SCHWEITZER  
JUAN G. GIRÁLDEZ  
DUANE MCLAUGHLIN  
BREON S. PEACE  
MEREDITH E. KOTLER  
CHANTAL E. KORDULA  
BENET J. O'REILLY  
ADAM E. FLEISHER  
SEAN A. O'NEAL  
GLENN P. MCGORRY  
MATTHEW P. SALERNO  
MICHAEL J. ALBANO  
VICTOR L. HOU  
ROGER A. COOPER  
AMY R. SHAPIRO  
JENNIFER KENNEDY PARK  
ELIZABETH LENAS  
LUKE A. BAREFOOT  
PAMELA L. MARCOGLIESE  
PAUL M. TIGER  
JONATHAN S. KOLODNER  
DANIEL ILAN  
MEYER H. FEDISA  
ADRIAN R. LEIPSI  
ELIZABETH VICENS  
ADAM J. BRENNEMAN

ARI D. MACKINNON  
JAMES E. LANGSTON  
JARED GERBER  
COLIN D. LLOYD  
COREY M. GOODMAN  
RISHI ZUTSHI  
JANE VANLARE  
DAVID H. HERRINGTON  
KIMBERLY R. SPOERRI  
AARON J. MEYERS  
DANIEL C. REYNOLDS  
RESIDENT PARTNERS  
SANDRA M. ROCKS  
S. DOUGLAS BORISKY  
JUDITH KASSEL  
DAVID E. WEBB  
PENELOPE L. CHRISTOPHOU  
BOAZ S. MORAG  
MARY E. ALCOCK  
HEIDE H. ILGENFRITZ  
HUGH C. CONROY, JR.  
KATHLEEN M. EMBERGER  
WALLACE L. LARSON, JR.  
AVRAM E. LUFT  
ANDREW WEAVER  
HELENA K. GRANNIS  
GRANT M. BINDER  
JOHN W. HARRISON  
CAROLINE F. HAYDAY  
RAHUL MUKHI  
NEIL R. MARKEL  
HUMAYUN KHALID  
CHRIS C. LEE  
KENNETH S. BLAZEJEWSKI  
KNOX L. MCILWAIN  
RESIDENT COUNSEL  
LOUISE M. PARENT  
OF COUNSEL

February 24, 2017

### BY ECF AND HAND DELIVERY

Hon. Dora L. Irizarry, U.S.D.J.  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Weiss, et al. v. National Westminster Bank Plc, 05-cv-4622 (DLI) (RML)  
Applebaum, et al. v. National Westminster Bank Plc, 07-cv-916 (DLI) (RML)

Dear Chief Judge Irizarry:

Pursuant to the Court's Orders dated August 2 and 12, 2016, I am enclosing on behalf of defendant National Westminster Bank Plc ("NatWest") a Chambers set of the parties' papers in support of and in opposition to NatWest's renewed motion for summary judgment. In accordance with Your Honor's Individual Rules, NatWest has filed all of the parties' papers concerning NatWest's motion. The enclosed documents include the following:

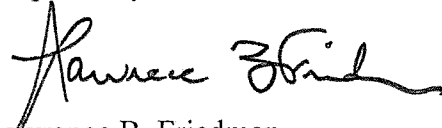
- Notice Of Renewed Motion Of NatWest For Summary Judgment;
- Memorandum Of Law Of NatWest In Support Of Its Renewed Motion For Summary Judgment;
- Declaration Of Mark S. Grube In Support Of Renewed Motion Of NatWest For Summary Judgment, and the exhibits submitted therewith;
- NatWest's Supplemental Statement Of Additional Material Facts As To Which There Is No Genuine Issue Pursuant To Local Civil Rule 56.1;
- Plaintiffs' Memorandum Of Law In Opposition To NatWest's Renewed Motion For Summary Judgment;

Hon. Dora L. Irizarry, U.S.D.J., p. 2

- Declaration Of Aaron Schlanger In Support Of Plaintiffs' Opposition To NatWest's Renewed Motion For Summary Judgment, and the exhibits submitted therewith;
- Plaintiffs' Local Civil Rule 56.1 (I) Response To Defendant's Supplemental Statement Of Additional Material Facts, And (II) Supplemental Counter-Statement Of Additional Material Facts;
- Reply Memorandum Of Law Of NatWest In Support Of Its Renewed Motion For Summary Judgment;
- NatWest's Amended Notice Pursuant To Rule 44.1; and
- NatWest's Certificate Of Service, Dated December 22, 2016.

We would be pleased to respond to any questions the Court may have concerning these submissions.

Respectfully,

A handwritten signature in black ink, appearing to read "Lawrence B. Friedman". The signature is fluid and cursive, with the first name "Lawrence" being more prominent than the last name "Friedman".

Lawrence B. Friedman

Enclosures

cc: All counsel of record (by email, without enclosures)